

The Lead Plaintiff and all other Plaintiffs

Case No. 1:23-CV-00989-JLH

June 14th 2024

The Honorable Jennifer L. Hall

United States District Court for the District of Delaware

844 N. King Street

Wilmington, DE 19801

**Re: Freitas, et al. v. Bolivarian Republic of Venezuela, et al. Case No.
1:23-CV-00989-JLH**

**URGENT MOTION FOR SEALED E-FILING PRIVILEGES,
TEMPORARY SEALING, AND CAPTION MODIFICATION**

Plaintiffs respectfully submit this Motion requesting specific relief to address the urgent and sensitive nature of the current situation in the above-captioned case.

REQUEST FOR RELIEF

1. Extension of E-Filing Privilege to include SEALED E-Filing Privileges:

- Plaintiffs request that the E-Filing privilege granted to the Lead Plaintiff be extended to include the ability to file sealed documents. Given the sensitive nature of the information and the urgency of protecting Plaintiffs' safety, it is essential that the Lead Plaintiff can efficiently file sealed documents without delay.

2. Temporary Sealing of the Case:

- Plaintiffs request that the entire case be temporarily sealed until the Court has ruled on the Emergency Motion for Immediate Relief Due to Unauthorized Disclosure of Sealed Information (D.I. 54). This measure is necessary to protect the integrity of the judicial process and the safety of the Plaintiffs. Plaintiffs bring to the attention of the Court that while it is true that Defendants had the right to bring to the Court a request for changes in the Caption, etc. it can be presumed from the credible and abundant evidence that Defendants had conspired to orchestrate a defamatory campaign against Plaintiffs that would not only jeopardize the judicial process but also put in danger the lives and wellbeing of Plaintiffs. Additional evidence is to be submitted as soon as the E-Filing privilege is extended for Sealed filings to the Lead Plaintiff.

The Lead Plaintiff and all other Plaintiffs

Case No. 1:23-CV-00989-JLH

3. Removal of Plaintiff Freites' Name from the Caption:

- Plaintiffs request that the name of Plaintiff Ivan Freites be removed from the case caption. Publicly associating Mr. Freites with this case brings unnecessary attention and places him in greater danger. Plaintiff Freites and other Plaintiffs have been harassed and attacked by individuals linked to Defendants as it has been shown in the evidence brought to the Court. Additional evidence is to be submitted as soon as the E-Filing privilege is extended for Sealed filings to the Lead Plaintiff.

4. Modification of Case Caption:

- Plaintiffs request that the "Bolivarian Republic of Venezuela" be eliminated from the case caption as it is not a Defendant in this case. Plaintiffs pray the Court for the change of the Case Caption with regards to Plaintiffs. Plaintiffs pray the court and so propose that the Plaintiffs or the relevance of Plaintiffs not be reflected in the Caption. Instead, Plaintiffs propose that the case be captioned as "Lead Plaintiff, et al. v. CITGO Petroleum Corporation, et al." or a similar title that reflects the actual parties involved in the litigation and not bring unnecessary attention to any specific Plaintiff, as it is the case now.

GROUND FOR RELIEF

1. Safety and Security of Plaintiffs:

- The unauthorized disclosure of sensitive information has already placed Plaintiffs at significant risk. Extending E-Filing privileges to include sealed documents will help mitigate this risk by allowing for the timely and secure submission of sensitive information.

2. Integrity of Judicial Process:

- Temporarily sealing the entire case is crucial to maintaining the integrity of the judicial process. This action will prevent further unauthorized disclosures and protect the interests of justice.

3. Minimizing Unnecessary Risks:

- Removing Mr. Freites' name from the caption will reduce the specific threats against him. Similarly, modifying the case caption to exclude the "Bolivarian Republic of Venezuela" will accurately reflect the Defendants and prevent confusion.

The Lead Plaintiff and all other Plaintiffs

Case No. 1:23-CV-00989-JLH

CONCLUSION

For the reasons set forth above, Plaintiffs respectfully request that this Honorable Court grant the following relief:

- Extend the E-Filing privilege granted to the Lead Plaintiff to include the ability to file sealed documents.
- Temporarily seal the case in its entirety until a ruling on D.I. 54 has been made.
- Remove the name of Plaintiff Ivan Freites from the case caption.
- Modify the case caption to accurately reflect the parties involved, such as "Lead Plaintiff, et al. v. CITGO Petroleum Corporation, et al."

Respectfully submitted,

/s/ **Lead Plaintiff**

Eichholzstrasse 2,
6312-CH

Lead Plaintiff	Name and address:
Plaintiff 2	All c/o
Plaintiff 3	LEAD PLAINTIFF
Plaintiff 4	Eichholzstrasse 2,
Plaintiff 5	6312 Steinhausen,
Plaintiff 6	Switzerland
Plaintiff 7	

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Case No. 1:23-CV-00989-JLH

CERTIFICATE OF SERVICE

I hereby certify that on 14th june 2024, a copy of the foregoing Motion was filed with the Clerk of Court and served upon all counsel of record via the Court's CM/ECF system.

Lead Plaintiff, Pro Se